

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

EDNA MARTIN and
MURRAY MARTIN,

PLAINTIFFS

VS

UNITED STATES OF AMERICA;
DEPARTMENT OF ARMY
ARMY AND AIR FORCE EXCHANGE
SERVICE, and instrumentality of the
Department of the Army and of the Air
Force and G&K SERVICES, INC.

DEFENDANTS.

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CIVIL ACTION NO: 1:08CV96-WKW

INITIAL DISCLOSURES

G & K Services, Inc., pursuant to Rule 26(a)(1) of the *Federal Rules of Civil Procedure* and this Court's Rule 16(b) Scheduling Order, files its Initial Disclosures as follows:

_____ (A) The name, and if known, the address and telephone number of each individual likely to have discoverable information that this Defendant may use to support its claims or defenses are:

1. Jon Heath
former National Account Manager for G & K Services, Inc.
Current address and telephone number unknown

Mr. Heath, although no longer employed by this Defendant, is expected to have knowledge pertaining to the contractual relationship between this Defendant and Army & Air Force Exchange Service.

2. Dave Watson
Branch Manager
G & K Services, Inc.
1141 Emery Folmer Blvd.
Montgomery, AL 36610-3261

Mr. Watson has knowledge pertaining to the contractual relationship between this Defendant and Army & Air Force Exchange Service.

3. Any and all of Plaintiff Edna Martin's treating physicians.

These persons are expected to have knowledge pertaining to Plaintiff Edna Martin's alleged injuries including but not limited to the nature of her injuries, the treatment for same as well as the extent and permanency of her condition.

4. Unknown employees and/or former employees of G & K Services, Inc.

These persons, while their identities are unknown at this time, are expected to have knowledge pertaining to the services provided by this Defendant to Army & Air Force Exchange Service at the Fort Rucker AAFES Main Store PX.

This Defendant's investigation into the allegations contained in Plaintiff's Complaint is preliminary and ongoing. This Defendant anticipates obtaining additional information during the discovery process which may be subject to disclosure and reserves the right to rely on such information if and when it is obtained and will file a supplemental disclosure to the extent required by the applicable rules.

- (B) The following is a description by category and location, of all documents, electronically stored information, and tangible things in the possession, or custody or control of this Defendant and that this Defendant may sue to support its claims or defenses:

This Defendant's investigation of the allegations contained in the Plaintiff's Complaint is ongoing. This Defendant anticipates obtaining additional information during the discovery process which may be responsive under the rules concerning disclosure and reserves the right to rely upon such information if and when it is obtained and will file a supplemental disclosure to the extent required by the applicable rules. At this time, G & K Services, Inc. discloses the following documents:

1. Contract between this Defendant and Army & Air Force Exchange Service including any and all amendments, attachments and exhibits thereto.

The above-described documents are available for copying and/or inspection at the office of counsel for this Defendant during normal business hours. Alternatively, counsel for this Defendant will provide a copy of said documents upon request.

- (C) Computation of any category of damages claimed by this Defendant:

Not applicable to this Defendant at this time.

- (D) Copy of any insurance agreements under which any person carrying on an insurance business may be liable to satisfy part or all of any judgment which may be entered in this action to indemnify or reimburse for payments made to satisfy the judgment.

Counsel for this Defendant has requested this information and will produce it immediately upon receipt of same.

Respectfully submitted,

/s/ Caroline T. Pryor
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CERTIFICATE OF SERVICE

I do hereby certify that I have on this 12th day of June, 2008, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and request the Court to serve the same electronically on the following:

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/s/ Caroline T. Pryor
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